

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

INA STEINER,
DAVID STEINER,
STEINER ASSOCIATES, LLC,
(*Publisher of EcommerceBytes*)

C.A. NO. 1:21-cv-11181-DPW

Plaintiffs,

v.

EBAY, INC.,
PROGRESSIVE F.O.R.C.E. CONCEPTS, LLC,
DEVIN WENIG,
STEVE WYMER,
JAMES BAUGH,
DAVID HARVILLE,
BRIAN GILBERT,
STEPHANIE POPP,
STEPHANIE STOCKWELL,
VERONICA ZEA,
PHILIP COOKE,
JOHN and JANE DOE,

Defendants.

**ASSENTED-TO MOTION TO EXTEND
DEFENDANT'S FILING OF RESPONSIVE
PLEADING TO PLAINTIFFS' COMPLAINT**

NOW COME the defendant, Progressive F.O.R.C.E. Concepts, Inc., through their attorney and requests that the deadline for filing a responsive pleading to the plaintiffs' complaint in the above captioned matter, be extended to on or before Friday, October 29, 2021. Plaintiffs' counsel has assented to this motion and no prejudice will result to any party by its allowance.

WHEREFORE, the defendant respectfully request that the Court grant their motion for an extension.

Respectfully submitted,
PROGRESSIVE F.O.R.C.E. CONCEPTS, LLC,
By Its Attorneys,

/s/ Matthew J. Holmes

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CERTIFICATION PURSUANT TO LOCAL RULE 7.1(A)(2)

The undersigned counsel for the defendant hereby certifies that he has attempted to confer with plaintiffs' counsel in this matter, in a good faith attempt to resolve or narrow the issues of dispute raised in the accompanying motion, in accordance with Local Rule 7.1 and further states that counsel for plaintiffs assents to the filing of this motion.

/s/ Matthew J. Holmes

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on September 15, 2021

/s/ Matthew J. Holmes